

**IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF DELAWARE**

**KAREN BARKES, individually;**  
**TINA GROSSMAN as next friend of**  
**BRITTANY BARKES; TINA GROSSMAN**  
**as next friend of ALEXANDRA BARKES;**  
**and KAREN BARKES as administratrix**  
**of the ESTATE OF CHRISTOPHER**  
**BARKES,**

**Plaintiffs,**

**v.**

**FIRST CORRECTIONAL MEDICAL INC.**  
**INC.; STANLEY TAYLOR;**  
**RAPHAEL WILLIAMS; CERTAIN**  
**UNKNOWN INDIVIDUAL EMPLOYEES**  
**OF STATE OF DELAWARE**  
**DEPARTMENT OF CORRECTION;**  
**CERTAIN UNKNOWN INDIVIDUAL**  
**EMPLOYEES OF FIRST**  
**CORRECTIONAL MEDICAL, INC.,**  
**and STATE OF DELAWARE,**  
**DEPARTMENT OF CORRECTION,**

**Defendants.**

**C. A. No. 06-104-JJF**

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

COME NOW, the above-captioned Defendants, by and through their counsel, and hereby move this Honorable Court to enter an Order granting Summary Judgment in their favor, and against the Plaintiffs in this matter, pursuant to Federal Rule of Civil Procedure 56(c), for the reasons set forth in the accompanying Opening Brief in Support of Defendants' Motion for Summary Judgment.

**DEPARTMENT OF JUSTICE  
STATE OF DELAWARE**

/s/Stephani J. Ballard

STEPHANI J. BALLARD (I.D. No. 3481)

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DATED: October 15, 2007

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**C. A. No. 06-104-JJF**

**CERTIFICATE OF MAILING AND/OR DELIVERY**

The undersigned certifies that on October 15, 2007, she caused the attached, *Defendants' Motion for Summary Judgment* to be electronically filed with the Clerk of Court using CM/ECF which will send notification of such filing to the following:

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/s/ Stephani J. Ballard  
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